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Attorneys for Plaintiff
Austson Arbi

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

AUSTSON ARBI,

Plaintiff,

vs.

SYNERGY USA LLC, et al.,

Defendants.

CASE NO.: 2:23-cv-01998- CDS-NJK

**JOINT REQUEST, STIPULATION
AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
DISCOVERY DEADLINES

(FIRST REQUEST)**

Pursuant to Local Rule (“Local Rule”) IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff *Austson Arbi* (“Plaintiff”) and **ALL** Defendants (collectively “Defendants”), by and through their respective undersigned counsel, hereby stipulate to extend the deadlines as enumerated in the parties’ Discovery Plan and Scheduling Order (EFC No. 12) by ninety (90) days, effective June 11, 2024. This is the first request for an extension of all deadlines by the parties and is not being made for the purpose of delay.

I. Discovery Completed To Date.

Defendants and Plaintiff served their Initial Disclosures on December 28, 2023. Plaintiff served his first sets of Request for Admissions, Request for Production of Documents, and Interrogatories to

Defendant Synergy on Thursday, December 28, 2023. Defendants served their first sets of Request for Admissions, Request for Production of Documents, and Interrogatories to Plaintiff on Friday, March 29, 2024.

II. Remaining Discovery To Be Completed.

Formal written discovery to other named Defendants, physical inspection of documents, third party subpoena(s), depositions of parties, and percipient witnesses have yet to be conducted.

III. Reason Discovery Cannot Be Completed Within the Original Deadline, Good Cause.

The parties believe good cause exists for their request to be granted. The parties continue the meet and confer process to resolve significant discovery disputes. Resolution of current discovery disputes will determine if discovery is needed from third parties, via subpoena(s), as well as the need for formal written discovery from other named Defendants, and when and how depositions will be taken. Additionally, Plaintiff's attorney, Ms. Neal, was hospitalized on April 30, 2024, for eight (8) days for a serious health condition. Ms. Neal has returned to work on a part-time basis while she undergoes treatments.

To conduct discovery in the most efficient manner, the parties have agreed that a 90-day extension of discovery deadlines is necessary effective June 11, 2024.

| EVENT | CURRENT DEADLINE | PROPOSED DEADLINE |
|---------------------------------------|-------------------------|---|
| Discovery Cutoff | Tuesday, June 11, 2024 | Monday, September 9, 2024 |
| Dispositive Motions | Thursday, July 11, 2024 | Wednesday, October 9, 2024 |
| Pretrial Order | Monday, August 12, 2024 | November 10, 2024 |
| Fed. R. Civ. P. 26(a)(3) Disclosures: | Thursday, July 11, 2024 | Tuesday, November 12, 2024 (11/10 is a Sunday, 11/11 is a holiday) |

1 Respectfully submitted and dated this 16th day of May 2024,

2 /s/ Victoria L. Neal

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11 *Austson Arbi*

/s/ Dylan J. Lawter

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Attorneys for ALL Defendants

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13 **IT IS SO ORDERED.**

14 Dated: May 17, 2024.

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17 UNITED STATES MAGISTRATE JUDGE
18 NANCY J. KOPPE
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